

PSJ10 Exh 68

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 - - -
5

6 IN RE: NATIONAL : HON. DAN A.
7 PRESCRIPTION OPIATE : POLSTER
8 LITIGATION :
9 :
10 APPLIES TO ALL CASES : NO.
11 : 1:17-MD-2804
12 :
13 :

14 - HIGHLY CONFIDENTIAL -
15

16 SUBJECT TO FURTHER CONFIDENTIALITY REVIEW
17 - - -
18

19 December 18, 2018
20 - - -
21

22 Videotaped deposition of
23 MICHAEL PERFETTO, taken pursuant to
24 notice, was held at the offices of Lief
 Cabraser, LLP, 250 Hudson Street, New
 York, New York, beginning at 9:09 a.m.,
 on the above date, before Michelle L.
 Gray, a Registered Professional Reporter,
 Certified Shorthand Reporter, Certified
 Realtime Reporter, and Notary Public.

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1 those shows for NACDS for Actavis.

2 Q. Okay. How about -- are you
3 familiar with the Alliance For Patient
4 Access?

5 A. No.

6 Q. How about the U.S. Pain
7 Foundation?

8 A. No.

9 Q. American Geriatric Society?

10 A. No.

11 Q. Pharmaceutical Research and
12 Manufacturers of American -- of America?

13 A. No.

14 Q. Cares Alliance?

15 A. There's Care Alliance that
16 was a distributor, I believe. But they
17 may not be the same one you're
18 referencing.

19 Q. Was the Care Alliance -- did
20 you have interaction with Care Alliance?

21 A. Was it -- where was it
22 located?

23 Q. I don't know.

24 A. Oh. Because if that were

1 Care, it was a distributor -- I never
2 dealt with Care Alliance. But there was
3 a -- you asked me if I ever heard of
4 them. There was a Care -- there was a
5 buying group I thought that had that
6 name.

7 Q. Okay. Have you heard of
8 Healthcare Distribution Alliance?

9 A. No.

10 Q. Did you ever hear that
11 Actavis participated in any advisory
12 boards?

13 A. I -- I was on the McKesson
14 advisory board for one or two years. And
15 I was on the -- maybe the NACDS planning
16 board for a year. I was on a few -- few,
17 what I call planning boards for meetings.

18 Q. Any other boards, advisory
19 boards that you are aware that Actavis
20 was involved in?

21 A. Actavis generic? Can I --

22 Q. Actavis generally.

23 A. I -- any boards that we were
24 involved in? No. I think what I stated.

1 McKesson -- I was on the McKesson vendor
2 board, and I believe I was on the NACDS
3 planning board for one year and maybe a
4 small grocery store meeting.

5 Q. And what were your
6 responsibilities on the McKesson advisory
7 board?

8 A. I attended a -- it was maybe
9 a four-hour meeting on -- on ways
10 McKesson could improve working with
11 vendors.

12 Q. Do you recall what was
13 recommended to McKesson to improve on --
14 in their --

15 A. I do not.

16 Q. You don't recall anything
17 about that?

18 A. I do not.

19 Q. Were there notes -- notes
20 taken of that meeting?

21 A. Not by me.

22 Q. Do you recall what your
23 responsibilities were with respect to the
24 NACDS planning board?

1 A. Suggest -- reviewing the
2 format of the meeting and -- and just top
3 line inputting from a vendor standpoint
4 to NACDS how to improve the meeting so it
5 was more productive.

6 Q. Well, what was the purpose
7 of the meeting?

8 A. To get -- to give NACDS
9 vendor input and advise -- advise NACDS
10 to improve -- how ways they can improve
11 their meeting, either the schedule,
12 maybe -- maybe the booth layout. Maybe
13 the -- the meals they were serving,
14 things like that.

15 Q. Meaning how NACDS could
16 improve their trade show?

17 A. Yes. Yes.

18 Q. And how many meetings did
19 you attend as part of the NACDS planning
20 board?

21 A. This again goes back
22 probably five or six years. I
23 probably -- I can recall one for sure.

24 Q. But there may have been

1 more?

2 A. Not many more. Maybe less
3 than -- one or two I would say, to my
4 knowledge right now that I attended.

5 Q. And who else was on those
6 boards with you, was on the NACDS
7 planning board with you?

8 A. Other vendors across --
9 across -- it could be food vendors. It
10 could be plastic bag vendors. It could
11 be cookie vendors. It was across --

12 Q. Who else involved in
13 pharmaceuticals was on the NACDS planning
14 board with you?

15 A. I don't recall --

16 Q. You don't recall anybody?

17 A. -- anyone from that advisory
18 board as I sit here today, who was on
19 with me.

20 Q. Okay. Do you recall anyone
21 that was on the McKesson advisory board
22 with you?

23 A. Maybe the woman from
24 Greenstone.

1 Q. What's Greenstone?

2 A. It's a generic manufacturer,
3 a generic division of Pfizer.

4 Q. Do you recall anybody else
5 on the McKesson advisory board with you?

6 A. Yeah. I believe -- I
7 believe Andy Boyer was on that with me
8 too.

9 Q. Where is he from?

10 A. Watson.

11 Q. Anybody else?

12 A. I mean, this is awhile ago
13 too. A representative from Teva, but I
14 don't know who -- who that was.

15 Q. Anybody else?

16 A. Not that I can think of.

17 Q. Can you recall if anybody
18 from Purdue was on the advisory board,
19 the McKesson advisory board?

20 A. No. These were generic
21 manufacturers.

22 Q. And do you -- do you recall
23 if Mallinckrodt was -- anybody from
24 Mallinckrodt was on either of those